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8 FRED EDE, III, EMILY WILLIAMS,
BRUCE PRITCHARD and JEAN STEINER
9

10 [Counsel for Other Parties Listed on Signature Pages]
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12 **UNITED STATES DISTRICT COURT**
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
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15 UNITED DESERT CHARITIES,
16 FRED EDE, III, EMILY WILLIAMS,
BRUCE PRITCHARD and JEAN
17 STEINER on behalf of themselves and
all others similarly situated,

18 Plaintiffs,

19 v.

20 SLOAN VALVE COMPANY,
21 AMERICAN STANDARD BRANDS
AS AMERICA, INC., KOHLER CO.,
22 GERBER PLUMBING FIXTURES,
LLC, MANSFIELD PLUMBING
23 PRODUCTS, LLC and HOME
DEPOT, U.S.A., INC.,

24 Defendants.
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Case No. CV12-06878 SJO (SHx)

STIPULATION RE FILING
PLAINTIFFS' UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL AND STAY OF
PROCEEDINGS

Action Filed: August 9, 2012

The Honorable S. James Otero

Consolidated Cases:
Berube v. Flushmate
2:13-cv-02372-SJO-SH
Brettler v. Flushmate
2:13-cv-02499-SJO-SH
Kubat, et. al. v. Flushmate
2:13-cv-02425-SJO-SH
Patel v. Flushmate
2:13-cv-02428-SJO-SH

Related Case:
Dimov, et. al., Sloan Valve Co.,
1:12-cv-09700 (N.D. Ill)

STIPULATION

The parties, through their respective counsel of record, hereby STIPULATE as follows:

WHEREAS, on January 28, 2014, the parties filed a fully executed copy of their proposed Class Action Settlement Agreement and Release (“Settlement Agreement”) with their Joint Status Report Regarding Settlement (ECF Dkt __);

WHEREAS, the Settlement Agreement, if preliminarily and finally approved by the Court under Rule 23 of the Federal Rules of Civil Procedure, would dispose of this Consolidated Action, and the related action, *Dimov, et. al. v. Sloan Valve Co.* (the “*Dimov Action*”), currently pending in the Northern District of Illinois, Case No. 1:12-CV-09700;

WHEREAS, Plaintiffs shall file their Unopposed Motion for Preliminary Approval of Class Action Settlement, together with all supporting declarations and exhibits, on or before Friday, January 31, 2014; and

WHEREAS, to facilitate mediation (before Hon. William J. Cahill (Ret.)) and settlement negotiations that have ultimately led to this proposed nationwide class settlement, this Court, pursuant to the stipulation of the parties, has stayed this Consolidated Action for the past several months, and the current stay expires on January 28, 2014. [See Dkt. 92, 106, 110 and 114.]

THEREFORE, IT IS HEREBY STIPULATED, by and between the parties, through their respective attorneys of record, and subject to approval of the Court, as follows:

1. Plaintiffs shall file their Unopposed Motion for Preliminary Approval of Class Action Settlement Agreement, together with all supporting declarations and exhibits, on or before Friday, January 31, 2014.

2. Except for provisionally lifting the stay solely for purposes of class action settlement approval proceedings under Rule 23 of the Federal Rules of Civil

1 Procedure, the Court should continue the stay and hold this Consolidated Action in
2 abeyance for all other purposes unless and until the Court orders otherwise.

3 **IT IS SO STIPULATED.**

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5 Dated: January 28, 2014

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8 By: /s/ Kristen Law Sagafi
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13 COMPANY, FLUSHMATE, a division of SLOAN
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14 business as AMERICAN STANDARD BRANDS,
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15 FIXTURES, LLC and MANSFIELD PLUMBING
PRODUCTS, LLC

16 Dated: January 28, 2014

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CERTIFICATION

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), Kristen Law Sagafi, the ECF User whose identification and password are being used to file the foregoing STIPULATION RE FILING PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL AND STAY OF PROCEEDINGS, attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: January 28, 2014

/s/Kristen Law Sagafi
Kristen Law Sagafi